

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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DEBORAH CHIN, Individually and on behalf of all others similarly situated,	)	Case No. 1:04-cv-10294-DPW
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
SONUS NETWORKS, INC., HASSAN	)	
AHMED, STEPHEN NILL,	)	
	)	
Defendants.	)	
	)	

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(Additional Captions Follow)

**[PROPOSED] ORDER  
FOR THE APPOINTMENT OF LEAD PLAINTIFF  
AND APPROVAL OF LEAD PLAINTIFF'S  
SELECTION OF CO-LEAD COUNSEL**

MICHELLE TREBITSCH, on behalf of ) Case No. 1:04-cv-10307-DPW  
herself and all others similarly situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )  
Defendants. )

INFORMATION DYNAMICS, LLC, on ) Case No. 1:04-cv-10308-DPW  
behalf of itself and all others similarly )  
situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., PAUL R. )  
JONES, EDWARD N. HARRIS, J. )  
MICHAEL O'HARA, HASSAN M. )  
AHMED and STEPHEN J. NILL, )  
Defendants. )

PETER KALTMAN, on behalf of himself ) Case No. 1:04-cv-10309-DPW  
and all others similarly situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., RUBIN )  
GRUBER, HASSAN AHMED and )  
STEPHEN NILL, )  
Defendants. )

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SAMANTHA DEN, individually and on behalf of all others similarly situated, ) Case No. 1:04-cv-10310-DPW  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL )  
Defendants. )  
)

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RONALD KASSOVER, on behalf of the Ronald Kassover IRA and all others similarly situated, ) Case No. 1:04-cv-10329-DPW  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, STEPHEN J. NILL, )  
Defendants. )  
)

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STEVE L. BAKER, Individually and on behalf of all others similarly situated, ) Case No. 1:04-cv-10333-DPW  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )  
Defendants. )  
)

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MICHAEL KAFFEE, Individually and on behalf of all others similarly situated, ) Case No. 1:04-cv-10345-DPW  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )  
Defendants. )  
)

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HAIMING HU, Individually and on behalf of all others similarly situated, ) Case No. 1:04-cv-10346-DPW  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL )  
Defendants. )  
)

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CHARLES STARBUCK, Individually and himself and all others similarly situated, ) Case No. 1:04-cv-10362-DPW  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN )  
AHMED, and STEPHEN NILL, )  
Defendants. )  
)

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SANUEL HO, Individually and on behalf ) Case No. 1:04-cv-10363-DPW  
of all others similarly situated, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 SONUS NETWORKS, INC., HASSAN )  
 AHMED, and STEPHEN NILL, )  
 )  
 Defendants. )  
 )

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JEFFREY C. RODRIGUES, Individually ) Case No. 1:04-cv-10364-DPW  
on behalf of all others similarly situated, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 SONUS NETWORKS, INC., HASSAN M. )  
 AHMED, and STEPHEN J. NILL, )  
 )  
 Defendants. )  
 )

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ROBERT CONTE and MARK RESPLER, ) Case No. 1:04-cv-10382-DPW  
on behalf of himself and all other similarly )  
 situated, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 SONUS NETWORKS, INC., HASSAN )  
 AHMED, and STEPHEN NILL, )  
 )  
 Defendants. )  
 )

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WHEATON ELECTRICAL SERVICES ) Case No. 1:04-cv-10383-DPW  
RETIREMENT 401 K PROFIT SHARING )  
PLAN, on behalf of itself and all others )  
similarly situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN )  
AHMED and STEPHEN J. NILL, )  
Defendants. )  
)

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BRIAN CLARK, Individually and on ) Case No. 1:04-cv-10454-DPW  
behalf of all others similarly situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., PAUL R. )  
JONES, EDWARD N. HARRIS, J. )  
MICHAEL O'HARA, HASSAN M. )  
AHMED, and STEPHEN J. NILL, )  
Defendants. )  
)

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SHEILA BROWNELL, Individually and on ) Case No. 1:04-CV-10597-DPW  
behalf of all others similarly situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN )  
AHMED and STEPHEN NILL, )  
Defendants. )  
)

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SAVERIO PUGLIESE, on behalf of ) Case No. 1:04-cv-10612-DPW  
himself and all others similarly situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, STEPHEN J. NILL, )  
Defendants. )

DAVID V. NOCITO, on behalf of ) Case No. 1:04-cv-10623-DPW  
himself and all others similarly situated, )  
Plaintiff, )  
vs. )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )  
Defendants. )

WHEREAS, Plaintiff Deborah Chin filed a putative class action under Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) on February 12, 2004 in this Court.

WHEREAS, Plaintiff Deborah Chin, in accordance with the provisions of Section 21D(a)(3)(A)(i) of the Exchange Act, 15 U.S.C. § 78u-4(a)(3)(A)(i) on February 12, 2004, caused to be published nationally in PRNEWSWIRE a notice advising class members of the pendency of the action, the claims asserted therein, the purported class period, and their right to move this Court to be appointed Lead Plaintiff.

WHEREAS, pursuant to Section 21D(a)(3)(B) of the Exchange Act, 15 U.S.C. § 78u-4(a)(3)(B), any purported class member desiring to be appointed Lead Plaintiff was required to have filed a motion for such appointment on or before April 12, 2004.

WHEREAS, the above-captioned actions involve common questions of law and fact.

WHEREAS, Plaintiffs Grace I. Belland, Leopoldo L. Mestre, Jacob I. Sherman, Scott L. Dunkley, Abdul S. Budhinani, and Sean P. McCarthy, collectively known as the “Belland Group,” have timely moved to be appointed Lead Plaintiff.

WHEREAS, the Belland Group has the largest financial interest in the relief sought by the class.

WHEREAS, the Belland Group otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure.

WHEREAS, the Belland Group, in accordance with Section 21D(a)(3)(B)(v) of the Exchange Act, 15 U.S.C. § 78u-4(a)(3)(B)(v), has sought approval of its selection of the law firms of Murra, Frank & Sailer LLP and Weiss & Yourman as Co-Lead Counsel.

**IT IS HEREBY ORDERED** as follows:

1. The above-captioned and above-referenced actions, as well as any other action now pending or hereafter filed in or transferred to this District as a class action on behalf of purchasers of the securities of Sonus Corporation, which arise out of the same facts as alleged in the above-referenced actions, are consolidated for all purposes to be captioned as follows:

-----X  
IN RE SONUS NETWORKS, INC. SECURITIES : 04 CV 10308 (DPW)  
LITIGATION :  
:-----X

2. The Belland Group is appointed Lead Plaintiff; and  
3. The Belland Group's selection of the law firms of Murray, Frank & Sailer LLP and Weiss & Yourman as Co-Lead Counsel is approved.

**SO ORDERED**

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Hon. Douglas P. Woodlock  
United States District Court Judge

DATED \_\_\_\_\_, 2004